Mr. Rasik Raval Limited Corporation 4133 New Haven Avenue Fort Wayne, IN 46803

Re: Registered Construction and Operation Status, 003-15062-00034

Dear Mr. Raval:

The application from Limited Corporation, received on November 13, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-5.5-1, it has been determined that the following emission units, located at 4133 New Haven Avenue, Fort Wayne, Indiana 46803, are classified as registered:

- (a) Five (5) vertical fixed roof cone storage tanks with the following numbering and capacities; # 20 194, 322 gallons, #21 194,322 gallons, #42 259,096 gallons, #43 259,078 gallons, and #51 259,078 gallons.
- (b) One (1) vertical internal floating roof storage tank # 39 with a storage capacity of 523,174 gallons.
- (c) One (1) above ground vertical internal floating roof gasoline storage tank # 28, with a maximum design capacity of 853,000 gallons, and a maximum throughput of 800,000 gallons per year.
- (d) One (1) above ground vertical internal floating roof gasoline storage tank # 29, with a maximum design capacity of 1,015,000 gallons, and a maximum throughput of 1,000,000 gallons per year.
- (e) One (1) above ground vertical fixed roof No. 2 fuel oil storage tank # 36, with a maximum design capacity of 365,000 gallons, and a maximum throughput of 300,000 gallons per year.
- (f) One (1) above ground vertical internal floating roof gasoline storage tank # 37, with a maximum design capacity of 1,287,000 gallons, and a maximum throughput of 1,000,000 gallons per year.
- (g) One (1) above ground vertical internal floating roof recovery oil storage tank # 38, with a maximum design capacity of 1,287,000 gallons, and a maximum throughput of 1,000,000 gallons per year.
- (h) One (1) above ground vertical internal floating roof interface storage tank # 55, with a maximum design capacity of 2,350,000 gallons, and a maximum throughput of 2,000,000 gallons per year.
- (i) One (1) above ground gasoline, No. 2 fuel oil, recovery oil, and distillate petroleum interface transport loading terminal, with a maximum design throughput of 17,499 gallons per day.
- (j) One (1) below ground gasoline, No. 2 fuel oil, recovery oil, and distillate petroleum interface pipeline breakout station.

- (k) One (1) No. 2 fuel oil (sulfur content 0.05%) fired boiler (# A) with a heat input of 29.0 mmBTU per hour.
- (I) One (1) natural gas fired boiler (# B) with a heat input rate of 4.0 mmBTU per hour.
- (m) One (1) boiler (# C) using # 2 fuel oil, rated at 2.8 MMBtu per hour.

The following conditions shall be applicable:

Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

Pursuant to 326 IAC 12, 40 CFR 60.112(a)(1) and 60.113, (NSPS, Subpart K) (Standards of Performance for Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced After June 11, 10873, and Prior to May 19, 1978), Tanks 28, 29, 36, 37, 38, 39, and 55 shall:

- a. be equipped with a floating roof, a vapor recovery system, or their equivalents, and
- b. maintain a record of:
 - (1) the petroleum liquid stored,
 - (2) the period of storage, and
 - (3) the true vapor pressure of that liquid during the respective storage period.

Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API bulletin 2517, unless the commissioner specifically requests that the liquid be sampled, the actual storage temperature be determined, and the Reid vapor pressure determined from the sample(s).

Pursuant to 40 CFR 63.420(d), (NESHAP, Subpart R) (National Emission Standards for Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)), the owner or operator shall:

- Operate the pipeline breakout station such that none of the facility parameters used to calculate results under paragraph (a) (1) of 40 CFR 63.420 is exceeded in any rolling 30day period, and
- b. Maintain records and provide reports in accordance with the provision of ξ63.428(j).

Pursuant to 326 IAC 8-4-3 (d) (Petroleum Sources: Petroleum Liquid Storage Facilities), the owner or operator of Tanks 28, 29, 37, 38, and 55 maintain records of:

- a. the types of volatile petroleum liquid stored,
- b. the maximum true vapor pressure of the liquid as stored, and
- c. the results of the inspections performed on the storage vessels.

Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

Pursuant to 326 IAC 8-4-4 (Petroleum Sources: Bulk Gasoline Terminals), no owner of operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad cars and barges unless:

- a) the bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation, and consisting of either:
 - (1) an adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/L of VOC to the atmosphere,
 - (2) a vapor collection system which directs all vapors to a fuel gas system or incinerator, or
 - (3) an approved control system, demonstrated to have a control efficiency equivalent to or greater than (1) above.
- b) displaced vapors and gases are vented only to the vapor control system.
- c) a means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- d) all loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

If employees of the owner of the petroleum distillate terminal are not present during loading, the owner or operator shall make certain that the vapor control system is attached to the transport. Further, the owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with the requirements of this rule.

Pursuant to 326 IAC 8-4-7 (Petroleum Sources: Gasoline Transports),

- a) all transports owned by the petroleum distillate terminal that are equipped with a vapor balance system or vapor recovery system shall only allow the transfer gasoline between the transports and storage tanks if:
 - (1) the vapor balance system or vapor recovery system is connected and operating according to manufacturer's specifications,
 - (2) transport compartment hatches are enclosed at all times during loading operations.
 - there are no visually or audibly detectable leaks in the transport's pressure/vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading,
 - (4) the pressure relief valves on tank trucks or trailers are set to release at no less

- than four and eight-tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch), and
- (5) the transports are designed, maintained, and operated so as to be vapor-tight.
- b) the employees of the owner of the petroleum distillate terminal shall be responsible for making sure that all trucks, owned by the source or not, comply with the requirements of (1) through (4) specified above, when the employees of the terminal are present to supervise or perform loading. The owner of the terminal shall also ensure that the owners of transports with a vapor balance system or vapor recovery system during unsupervised times comply with this section.

Pursuant to 326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems):

- (a) the owner or operator of the petroleum distillate terminal shall not allow a gasoline transport to be emptied or filled unless the gasoline transport:
 - (1) is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedure approved by the commissioner.
 - the transport sustains a pressure change of no more than seven hundred and fifty (750) Pascals (three(3) inches of H2O) in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals (eighteen (18) inches of H2O) or evacuated to a gauge pressure of one thousand five hundred (1,500) Pascals (six (6) inches of H2O) during the testing required in subdivision (1).
 - is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the requirements of subdivision (2) above,
 - (4) displays a sticker which shows the date that the gasoline truck last passed the test required in subdivisions (1) through (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.'
- (b) the owner or operator of the terminal shall be responsible for compliance with the above mentioned transport requirements and shall take all reasonable steps to ensure that transports loading at its facility comply with said requirements, and shall, in all cases when its employees are present to supervise or perform loading, be responsible for the compliance of subdivision a)(4) above.
- (c) the owner or operator of a vapor balance system or vapor control system shall:
 - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (a) gauge pressure of four thousand five hundred (4,500) Pascals (eighteen (18) inches of H2O) and a vacuum for exceeding one thousand five hundred (1,500) Pascals (six (6) inches of H2O) in the gasoline tank truck,
 - (b) a reading equal to or greater than one hundred percent (100%)of the lower explosive limit (LEL, measured as propane) at two and five tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the other method referenced in Appendix B of "Control of Organic Compound Leaks from Gasoline Tank Trucks and

Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by the Commissioner during loading or unloading operations, and

- (c) avoidable visible liquid leaks during loading and unloading operations.
- (2) within (15) days, repair and retest a vapor collection or control system that exceeds the limits in subdivision (1) above.
- (d) the owner or operator may, at any time, monitor a gasoline tank truck, vapor balance referenced, to confirm compliance with a) and b) above.
- (e) the owner or operator shall maintain records of all certification testing repairs such that the records identify the following:
 - (1) the gasoline tank truck, vapor collection system, or vapor control system,
 - (2) the date of the test or repair, and
 - (3) if applicable, the type of repair and date of retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.

(f) the owner or operator may request alternative test procedures for the tests required in subsection a)(1) or c)(1)(B). However, such method shall be submitted to the U.S. EPA as a SIP revision.

Pursuant to 326 IAC 6-2-3 (Particulate Emission Limitations from Sources of Indirect Heating: Emission Limitations for Facilities Specified in 326 IAC 6-2-1(b)), particulate emission limitations for Boiler A shall be limited to 0.80 lb per mmBTU of heat input.

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations from Sources of Indirect Heating: Emission Limitations for Facilities Specified in 326 IAC 6-2-1(c)), particulate emission limitations for Boilers B and C are 0.45 and 0.43 lb per mmBTU of heat input, respectively.

Pursuant to 326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations), sulfur dioxide emissions from each of Boilers A and C shall be limited to 0.5 pounds per mmBTU heat input.

This registration is a re-registration issued to this source. The source may operate according to 326 IAC 2-5.5.

An authorized individual shall provide an annual notice to the Office of Air Quality that the source is in operation and in compliance with this registration pursuant to 326 IAC 2-5.5-4(a)(3). The annual notice shall be submitted to:

Compliance Data Section Office of Air Quality 100 North Senate Avenue P.O. Box 6015 Indianapolis, IN 46206-6015 no later than March 1 of each year, with the annual notice being submitted in the format attached.

Any change or modification which may increase the actual emissions of VOC to fifteen (15) pounds per day or the potential to emit of a combination of HAPs to twenty-five (25) tons per year or a single HAP to ten (10) tons per year from this source shall require approval from IDEM, OAQ, prior to making the change.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

mm

cc: File - Allen County

Allen County Health Department Air Compliance - Jennifer Dorn Permit Tracking - Janet Mobley

Technical Support and Modeling - Michele Boner

Compliance Data Section - Karen Nowak

Registration

This form should be used to comply with the notification requirements under 326 IAC 2-5.5-4(a)(3)

| Company Name: Limited Corporation |
|-----------------------------------|
| Address: 4133 New Haven Avenue |
| City: Fort Wayne, IN 46803 |
| Authorized individual: |
| Phone #: |
| Registration #: 003-15062-00034 |

I hereby certify that **Limited Corporation** is still in operation and is in compliance with the requirements of Registration **003-15062-00034**.

| Name (typed): | |
|---------------|--|
| Title: | |
| Signature: | |
| Date: | |

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Registration

Source Background and Description

Source Name: Limited Corporation

Source Location: 4133 New Haven Avenue, Fort Wayne, IN 46803

County: Allen SIC Code: 5171

Operation Permit No.: 003-15062-00034
Permit Reviewer: Madhurima D. Moulik

The Office of Air Quality (OAQ) has reviewed an application from Limited Corporation relating to the construction of a small boiler using # 2 fuel oil, and the operation of several storage tanks, loading terminals, and heat combustion units.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) Five (5) vertical fixed roof cone storage tanks with the following numbering and capacities; # 20 194, 322 gallons, #21 194,322 gallons, #42 259,096 gallons, #43 259,078 gallons, and #51 259,078 gallons.
- (b) One (1) vertical internal floating roof storage tank # 39 with a storage capacity of 523,174 gallons.
- (c) One (1) above ground vertical internal floating roof gasoline storage tank # 28, with a maximum design capacity of 853,000 gallons, and a maximum throughput of 800,000 gallons per year.
- (d) One (1) above ground vertical internal floating roof gasoline storage tank # 29, with a maximum design capacity of 1,015,000 gallons, and a maximum throughput of 1,000,000 gallons per year.
- (e) One (1) above ground vertical fixed roof No. 2 fuel oil storage tank # 36, with a maximum design capacity of 365,000 gallons, and a maximum throughput of 300,000 gallons per vear.
- (f) One (1) above ground vertical internal floating roof gasoline storage tank # 37, with a maximum design capacity of 1,287,000 gallons, and a maximum throughput of 1,000,000 gallons per year.
- (g) One (1) above ground vertical internal floating roof recovery oil storage tank # 38, with a maximum design capacity of 1,287,000 gallons, and a maximum throughput of 1,000,000 gallons per year.

- (h) One (1) above ground vertical internal floating roof interface storage tank # 55, with a maximum design capacity of 2,350,000 gallons, and a maximum throughput of 2,000,000 gallons per year.
- (i) One (1) above ground gasoline, No. 2 fuel oil, recovery oil, and distillate petroleum interface transport loading terminal, with a maximum design throughput of 17,499 gallons per day.
- (j) One (1) below ground gasoline, No. 2 fuel oil, recovery oil, and distillate petroleum interface pipeline breakout station.
- (k) One (1) No. 2 fuel oil (sulfur content 0.05%) fired boiler (# A) with a heat input of 29.0 mmBTU per hour.
- (I) One (1) natural gas fired boiler (# B) with a heat input rate of 4.0 mmBTU per hour.

New Emission Units and Pollution Control Equipment

The source also consists of the following new unit:

(a) One (1) boiler (# C) using # 2 fuel oil, rated at 2.8 MMBtu per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

- (a) Registration No.: 003-7766-00034, issued on March 19, 1997;
- (b) Registration No.: 003-10368-00034, issued on February 1, 1999; and
- (c) Exemption No.: 003-12843-00034, issued on January 29, 2001.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

There are no enforcement actions pending.

Storage Tank Summary

| Storage Tank ID | Annual throughput (Gal/yr) | Tank Volumes (gal) |
|---|----------------------------------|--------------------|
| 20 (Vertical, fixed roof) No. 2 oil | 500,000 | 194,322 |
| 21 (Vertical, fixed roof) Used oil | 4,000,000 | 194,322 |
| 39 (Vertical, internal floating roof) Recovery Oil | 500,000 | 523,174 |
| 42 (Vertical, fixed roof) No. 4 oil | 500,000 | 259,096 |

| 43 (Vertical, fixed roof) No. 4 oil | 500,000 | 259,078 |
|--|-----------|-----------|
| 51 (Vertical, fixed roof) No.4 oil | 500,000 | 259,078 |
| 28 (Vertical, internal floating roof) Gasoline | 800,000 | 853,000 |
| 29 (Vertical, internal floating roof) Gasoline | 1,000,000 | 1,015,000 |
| 36 (Vertical, fixed roof) No. 2 oil | 300,000 | 365,000 |
| 37 (Vertical, internal floating roof) Gasoline | 1,000,000 | 1,287,000 |
| 38 (Vertical, internal floating roof) Crude oil | 1,000,000 | 1,287,000 |
| 55 (Vertical, fixed roof) Gasoline | 2,000,000 | 2,350,000 |

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on November 13, 2001, with additional information received on December 3, 2001.

Emission Calculations

See Appendix A of this document for detailed emissions calculations.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

| Pollutant | Potential To Emit (tons/year) | | |
|-----------------|-------------------------------|--|--|
| PM | 2.2 | | |
| PM-10 | 0.4 | | |
| SO ₂ | 9.5 | | |
| VOC | 24.9 | | |
| CO | 5.3 | | |
| NO _x | 21.7 | | |

| HAP's | Potential To Emit (tons/year) |
|------------------|-------------------------------|
| Xylene | 2.4 |
| Toluene | 5.3 |
| Cyclohexane | 1.2 |
| MTBE | 3.6 |
| Combination HAPs | 14.4 |

- (a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of all criteria pollutants are less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than 10 tons per year and that of combination HAPs is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.
- (c) The potential to emit of VOC and NOx are greater than ten (10) tons per year and less than twenty-five (25) tons per year. Therefore, the source will be issued a registration under 326 IAC 2-5.5-1.

County Attainment Status

The source is located in Allen County.

| Pollutant | Status | |
|-----------------|------------|--|
| PM-10 | attainment | |
| SO ₂ | attainment | |
| NO_2 | attainment | |
| Ozone | attainment | |
| CO | attainment | |
| Lead | attainment | |

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Allen County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.
- (b) Allen County has been classified as attainment or unclassifiable for other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from this permit 003-15062-00034, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

- (a) each criteria pollutant is less than 100 tons per year,
- (b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
- (c) any combination of HAPs is less than 25 tons/year.

Federal Rule Applicability

(a) 40 CFR 60.113 (Monitoring of Operations), Subpart K(Standards of performance for

Storage Vessels for Petroleum Liquids for which Construction, Reconstruction, or Modification Commenced after June11, 1973, and Prior to May 19, 1978, rule 40 CFR 60.110 to 40 CFR 60.113)

Subpart K does not apply to tanks 20, 21, 42, 43, and 51, because their construction in 1960 predates the rule. This rule applies to floating roof storage tank 39. This tank has a capacity greater than 40,000 gallons, and was constructed in 1975, after the applicable date of March 8, 1974 (40 CFR 60.110(c)(1)). As per rule 40 CFR 60.112, this storage tank is equipped with a floating roof.

In addition, tanks 28, 29, 36, 37, 38, and 55 are subject to Subpart K, because each tank has a capacity greater than the applicable capacity of 65,000 gallons and were all constructed in 1975, after the applicable date of June 11, 1973 (40 CFR 60.110(c)(2)). These tanks are required to be equipped with a floating roof, a vapor recovery system, or their equivalents.

Pursuant to 40 CFR 60.113, the source is required to keep the records of petroleum liquid stored, the period of storage, and the maximum true vapor pressure of that liquid during the respective storage period, for tanks # 28, 29, 36, 37, 38, 39, and 55.

Available data on the typical Reid vapor pressure and the maximum expected storage temperature of the stored product may be used to determine the maximum true vapor pressure from nomographs contained in API bulletin 2517, unless the commissioner specifically requests that the liquid be sampled, the actual storage temperature be determined, and the Reid vapor pressure determined from the sample(s).

(b) 40 CFR Part 60 (326 IAC 12), Subpart Ka, Kb.

Subpart Ka is applicable to storage vessels for petroleum liquids for which construction, reconstruction, or modification commenced after May 18, 1978, and prior to July 23, 1984. Ka and Kb do not apply to storage tanks 20, 21, 42, 43 and 51, because their construction predates these rules. Tanks 28, 29, 36, 37, 38, and 55 are also not subject to Subpart Ka and Kb, because the tanks were constructed in 1975, prior to the applicable dates.

(c) <u>40 CFR 60.500, Subpart XX</u>

40 CFR 60.501 defines a bulk gasoline terminal as a gasoline facility that receives gasoline throughput greater than 75,700 liters (20, 026 gallons) per day. The combined throughput from this operation is below this threshold. Therefore, this petroleum distillate terminal is not subject to 40 CFR 60.500 (New Source Performance Standards for Bulk Gasoline Terminals).

(d) 40 CFR 60.40c-60.48c, Subpart Dc

The New Source Performance Standards for Small Industrial - Commercial Steam Generating Units, Subpart Dc, does not apply to boilers B and C because each of these two boilers have a maximum heat capacity of less than 10 mmBTU per hour. Subpart Dc is also not applicable to Boiler A, since this boiler was constructed prior to the June 9, 1989 applicability date.

(e) 40 CFR Part 63, National Emission Standards for Hazardous Air Pollutants (NESHAP)
This petroleum distillate terminal is subject to the National Emission Standards for
Hazardous Air Pollutants (NESHAP), Subpart R, 40 CFR 63.420-63.429 (Standards for
Gasoline Distribution Facilities (Bulk Gasoline Terminals and Pipeline Breakout Stations)
because this terminal includes a pipeline breakout station as defined in 40 CFR 60.501.

Pursuant to 40 CFR 63.420(b)(1), the provisions of this subpart apply to pipeline breakout stations except when the emissions screening factor (Ep), as determined using the given equation, is greater than one. If Ep is less than one, then the pipeline breakout station is subject to the requirements of 40 CFR 63.420(c), (d), and (f).

Permit Reviewer: Madhurima D. Moulik

The emissions screening factor (Ep) is determined as follows:

```
Ep =
                 CF [ 6.7(T_F) (1-CE) + 0.21 (T_F) + 0.093 (T_{FS}) + 0.1 (T_I) + 5.31 \times 10-6(C) + 0.04 (OE)
        Еp
                         emission screening factor for bulk gasoline terminals;
        CF
                         0.161 for bulk gasoline terminals that do not handle any reformulated or
                         oxygenated gasoline
        T_{F}
                         total numbers of fixed-roof gasoline storage vessels without an internal
        CE
                         federally enforceable control efficiency of the vapor processing system
                          used to control emissions from the fixed roof gasoline storage vessels;
        T_{F}
                         total numbers of external floating roof gasoline storage vessels with only
                         primary seals;
        T_{ES}
                         total number of external floating roof gasoline storage vessels with primary
                         and secondary seals;
        T_{i}
                         total number of fixed roof gasoline storage vessels with an internal floating
                         roof:
        С
                          numbers of valves, pumps, connectors, loading arms valves, and open
                         ending lines in gasoline service;
        OE
                         other HAP emissions screening factor for bulk gasoline terminals. (Other
                 =
                         HAP emissions from the tanks with jet kerosene and distillate oil
                         considered 0.1 tpy as worst case)
Еp
                 0.161 [6.7 (0) (1-0.95) + 0.21 (0) + 0.093 (0) + 0.1 (1) + 5.31 \times 10^{-6} (1000) +
                 0.04 (0) ]
                 0.161 (0.11)
        =
                 0.017
```

Ep is less than 1.0, therefore the pipeline breakout station is subject to the requirements of 40 CFR 63.420(c), (d) and (f).

Pursuant to 40 CFR 63.420(d), a facility for which results of Ep is determined to be less than 0.50, is exempt from the requirements of this subpart, except that the owner or operator shall:

- (1) Operate the pipeline breakout operation such as none of the facility parameters used to calculate results under paragraph (a)(1) of 40 CFR 63.420 is exceeded in any rolling 30-day period;
- (2) Maintain records and provide reports in accordance with the provision of ξ63.428(j).

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Allen County and the potential to emit of all pollutants is less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15)

Limited Corporation Page 7 of 11
Fort Wayne, Indiana 003-15062-00034

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minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the storage tanks will emit less than 10 tons per year of a single HAP and less than 25 tons per year of a combination of HAPs. Therefore, rule 2-4.1 does not apply. 326 IAC 8-4-1 (Petroleum Sources: Applicability)

Sections 2 through 5 and 7 through 9 of this rule applies to new sources as of January 1, 1980. This source, located in Allen County, was issued a new source registration in February 1999. Therefore, Sections 2 through 5 and 7 through 9 of this rule would apply to this source.

326 IAC 8-4-3 (Petroleum Sources: Petroleum Liquid Storage Facilities)

The internal floating roof above ground vertical storage tanks identified as 28, 29, 37, 38, and 55 are subject to 326 IAC 8-4-3, because the tanks have storage capacities greater than 150,000 liters (39,000 gallons) and contain volatile organic compounds with true vapor pressure greater than 1.52 psi.

Tank 36 is not subject to 326 IAC 8-4-3 because the liquids stored have true vapor pressure of 0.01 psi.

Pursuant to 326 IAC 8-4-3(d), the owner or operator of tanks 28, 29, 37, 38, and 55 shall maintain records of:

- (f) the types of volatile petroleum liquid stored,
- (g) the maximum true vapor pressure of the liquid as stored, and
- (h) the results of the inspections performed on the storage vessels.

Such records shall be maintained for a period of two (2) years and shall be made available to the commissioner upon written request.

326 IAC 8-4-4 (Petroleum Sources: Bulk Gasoline Terminals)

The petroleum distillate terminal is subject to 326 IAC 8-4-4 because the source is a bulk gasoline terminal as defined in 326 IAC 1-2-8. Pursuant to 326 IAC 8-4-4, no owner of operator of a bulk gasoline terminal shall permit the loading of gasoline into any transport, excluding railroad cars and barges unless:

- a) the bulk gasoline terminal is equipped with a vapor control system, in good working order, in operation, and consisting of either:
 - (1) an adsorber or condensation system which processes and recovers vapors and gases from the equipment being controlled, releasing no more than 80 mg/L of VOC to the atmosphere,
 - (2) a vapor collection system which directs all vapors to a fuel gas system or incinerator, or
 - (3) an approved control system, demonstrated to have a control efficiency equivalent to or greater than (1) above.
- b) displaced vapors and gases are vented only to the vapor control system.
- c) a means is provided to prevent liquid drainage from the loading device when it is not in use or to accomplish complete drainage before the loading device is disconnected.
- d) all loading and vapor lines are equipped with fittings which make vapor-tight connections and which will be closed upon disconnection.

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If employees of the owner of the petroleum distillate terminal are not present during loading, the owner or operator shall make certain that the vapor control system is attached to the transport. Further, the owner of the terminal shall take all reasonable steps to insure that owners of transports loading at the terminal during unsupervised times comply with the requirements of this rule.

326 IAC 8-4-5 (Bulk Gasoline Plant)

The source is not subject to 326 IAC 8-4-5 because it is not a bulk gasoline plant as defined in 326 IAC 1-2-7.

326 IAC 8-4-6 (Gasoline Dispensing Facility)

The source is not subject to 326 IAC 8-4-6 because it is not a gasoline dispensing facility as defined in 326 IAC 8-4-6(a)(8). Gasoline dispensing facilities dispense gasoline into motor vehicle fuel tanks. This source stores and transfers fuel to other sources and dispensing facilities.

326 IAC 8-4-7 (Petroleum Sources: Gasoline Transports)

This source includes gasoline transport loading terminals and is therefore subject to this rule. Pursuant to this rule:

- a) all transports owned by the petroleum distillate terminal that are equipped with a vapor balance system or vapor recovery system shall only allow the transfer gasoline between the transports and storage tanks if:
 - (1) the vapor balance system or vapor recovery system is connected and operating according to manufacturer's specifications,
 - (2) transport compartment hatches are enclosed at all times during loading operations,
 - (3) there are no visually or audibly detectable leaks in the transport's pressure/vacuum relief valves, hatch cover, trailer compartments, storage tanks, or associated vapor and liquid lines during loading or unloading,
 - (4) the pressure relief valves on tank trucks or trailers are set to release at no less than four and eight-tenths (4.8) kilo Pascals (seven-tenths (0.7) pounds per square inch), and
 - (5) the transports are designed, maintained, and operated so as to be vapor-tight.
- b) the employees of the owner of the petroleum distillate terminal shall be responsible for making sure that all trucks, owned by the source or not, comply with the requirements of (1) through (4) specified above, when the employees of the terminal are present to supervise or perform loading. The owner of the terminal shall also ensure that the owners of transports with a vapor balance system or vapor recovery system during unsupervised times comply with this section.

326 IAC 8-4-9 (Leaks from Transports and Vapor Collection Systems)

This rule applies to all gasoline vapor balance and vapor control systems at the petroleum distillate terminal at sources that are subject to Sections 4 through 6 and Section 7 of this rule. This source is subject to Sections 4 and 7 of this rule, and is therefore subject to 326 IAC 8-4-9.

Therefore, pursuant to 326 IAC 8-4-9:

- (a) the owner or operator of the petroleum distillate terminal shall not allow a gasoline transport to be emptied or filled unless the gasoline transport:
 - (1) is tested annually according to test procedures consistent with Appendix A of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA-450/2-78-051, or equivalent procedure approved by the commissioner,
 - (2) the transport sustains a pressure change of no more than seven hundred and fifty

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(750) Pascals (three(3) inches of H2O) in five (5) minutes when pressurized to a gauge pressure of four thousand five hundred (4,500) pascals (eighteen (18) inches of H2O) or evacuated to a gauge pressure of one thousand five hundred (1,500) Pascals (six (6) inches of H2O) during the testing required in subdivision (1),

- is repaired by the owner or operator and retested within fifteen (15) days of testing if it does not meet the requirements of subdivision (2) above,
- (4) displays a sticker which shows the date that the gasoline truck last passed the test required in subdivisions (1) through (2). Such sticker shall be displayed near the Department of Transportation Certification Plate required by 49 CFR 178.340-10b.'
- (b) the owner or operator of the terminal shall be responsible for compliance with the above mentioned transport requirements and shall take all reasonable steps to ensure that transports loading at its facility comply with said requirements, and shall, in all cases when its employees are present to supervise or perform loading, be responsible for the compliance of subdivision a)(4) above.
- (c) the owner or operator of a vapor balance system or vapor control system shall:
 - (1) design and operate the applicable system and the gasoline loading equipment in a manner that prevents:
 - (a) gauge pressure of four thousand five hundred (4,500) Pascals (eighteen (18) inches of H2O) and a vacuum for exceeding one thousand five hundred (1,500) Pascals (six (6) inches of H2O) in the gasoline tank truck,
 - (b) a reading equal to or greater than one hundred percent (100%)of the lower explosive limit (LEL, measured as propane) at two and five tenths (2.5) centimeters from all points on the perimeter of a potential leak source when measured by the other method referenced in Appendix B of "Control of Organic Compound Leaks from Gasoline Tank Trucks and Vapor Collection Systems", EPA 450/2-78-051, or an equivalent procedure approved by the Commissioner during loading or unloading operations, and
 - (c) avoidable visible liquid leaks during loading and unloading operations.
 - (2) within (15) days, repair and retest a vapor collection or control system that exceeds the limits in subdivision (1) above.
- (d) the owner or operator may, at any time, monitor a gasoline tank truck, vapor balance referenced, to confirm compliance with a) and b) above.
- (e) the owner or operator shall maintain records of all certification testing repairs such that the records identify the following:
 - (1) the gasoline tank truck, vapor collection system, or vapor control system,
 - (2) the date of the test or repair, and
 - (3) if applicable, the type of repair and date of retest.

The records shall be maintained in a legible, readily available condition for at least two (2) years after the date the testing or repair was completed.

(f) the owner or operator may request alternative test procedures for the tests required in

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subsection a)(1) or c)(1)(B). However, such method shall be submitted to the U.S. EPA as a SIP revision.

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

326 IAC 8-9 does not apply to the equipment at the source because the source is not located in Clark, Floyd, Lake, or Porter Counties.

326 IAC 6-2 (Particulate Emission Limitations for Sources of Indirect Heating)

(a) Pursuant to 326 IAC 6-2-3, boiler A, constructed in June, 1977, and with a maximum heat capacity of 29 mmBTU per hour, meets the criteria for facilities specified in 326 IAC 6-2-1
 (b) (Facilities existing and in operation before September 21, 1983). Therefore, the particulate emissions from boiler A shall be limited by the following equation:

Pt =
$$(C \times a \times h) / (76.5 \times Q^{0.75} \times N^{0.25})$$

Where:

C = maximum ground level concentration (default = $50 \mu g/m3$)

Pt = lb of PM emitted per mmBTU heat capacity

Q = total source maximum operating capacity = 29 mmBTU

N = number of stacks in fuel burning operation

a = plume rise factor (default = 0.67 for Q less than 1000 mmBTU per hour)

Pt = $(50 \mu/m3 \times 0.67 \times 27)/(76.5 \times 29^{0.75} \times 2^{0.25}) = 0.80$ lb of PM per mmBTU heat input

= (0.8 lb/mmBTU x 29 mmBTU/ hr x (8760 hr/yr) / (2000 lb/ton))

Pt = 101.62 tons per year for boiler A

The potential to emit of boiler A is 1.8 tons per year, which is less than the allowable emissions, therefore boiler A complies with this rule.

(b) Pursuant to 326 IAC 6-2-4, boiler B, constructed in December, 1996, and with a maximum heat capacity of 4.0 mmBTU per hour, meets the criteria for facilities specified in 326 IAC 6-2-1 (c) (Facilities constructed after September 21, 1983). Therefore, the particulate emissions from boiler B shall be limited by the following equation:

 $Pt = 1.09 / Q^{0.26}$

Where:

Pt = pounds of particulate matter emitted per mmBTU heat input

Q = total source maximum operating capacity rating in mmBTU per hour = 33 mmBTU per hour (including boiler A, which was constructed prior to boiler B).

Pt = 0.45 lb of particulate matter per mmBTU heat input

= (0.45 lb / mmBTU x 4 mmBTU/hr x (8760 hr/yr) / (2000 lb/ton))

= 7.9 tons per year

The potential to emit of boiler B is 0.21 tons per year, which is less than the allowable emissions.

Therefore, boiler B is in compliance with this rule.

(c) Pursuant to 326 IAC 6-2-4, boiler C, constructed in 2001, and with a maximum heat capacity of 2.8 mmBTU per hour, meets the criteria for facilities specified in 326 IAC 6-2-1 (b) (Facilities existing and in operation before September 21, 1983). Therefore, the particulate emissions from boiler C shall be limited by the following equation:

 $Pt = 1.09 / Q^{0.26}$

Where:

Pt = pounds of particulate matter emitted per mmBTU heat input Q = total source maximum operating capacity rating in mmBTU per hour = 35.8 mmBTU per hour (including boilers A and B, both constructed before boiler C).

Pt = 0.43 lb of particulate matter per mmBTU heat input

 $= (0.43 \text{ lb/mmBTU } \times 2.8 \text{ mmBTU/hr } \times (8760 \text{ hr/yr })/(2000 \text{ lb/ton})$

= 5.27 tons per year

The potential to emit of boiler C is 0.2 tons per year, which is less than the allowable emissions. Therefore, boiler C is in compliance with this rule.

326 IAC 7-1.1 (Sulfur Dioxide Emission Limitations)

Pursuant to 326 IAC 7-1.1, the sulfur dioxide emissions from each of boiler A and boiler C shall be limited to 0.5 lb per mmBTU heat input. Therefore, the SO2 emissions from boiler A shall be limited to 63.5 tons per year. The SO2 emissions from boiler C shall be limited to 6.1 tons per year. Both of these boilers are in compliance with this rule.

This rule does not apply to boiler B which uses natural gas as fuel.

Conclusion

The operation of the oil fueled boiler shall be subject to the conditions of the attached proposed Registration No. 003-15062-00034.

Source Name: Limited Corporation Page 1 of 5 TSD Appendix A

Source Location: 4133 New Haven Avenue, Fort Wayne, IN 46803

County: Allen SIC Code: 5171

Operation Permit No.: 003-15062-00034 Permit Reviewer: Madhurima D. Moulik

Date: Dec 3, 2001

Tank Emissions (PTE in tons per year)

| Tank ID | Liquid Stored | VOC Emissions lb/yr | VOC Emissions tons/yr |
|---------|---------------------------------------|--------------------------|-----------------------|
| 20 | No. 2 fuel oil | 16.36 | 0.0081 |
| 21 | Used oil | 69.24 | .034 |
| 39 | JP-4 | 603.88 | .301 |
| 42 | Residual oil #6 Distillate oil # 2 | 10.58 | .0052 |
| 43 | Residual oil #6 Distillate oil # 2 | 11.05 | .0055 |
| 51 | Residual oil #6 Distillate oil # 2 | 11.05 | .0055 |
| 28 | Gasoline | 3456.6 | 1.73 |
| 29 | Gasoline | 2610.6 | 1.31 |
| 36 | # 2 oil | 42.5 | 0.02 |
| 37 | Gasoline | 4159.7 | 2.08 |
| 38 | Crude oil | 674.9 | 0.33 |
| 55 | Gasoline | 10045.4 | 5.02 |
| | | Total PTE (tons per yr)= | 10.9 |

Loading Rack Emissions (PTE in tons per year) (based on Registration No. 003-10368-00034)

= 13.73 tons VOC per year.

HAP Emissions: (based on Registration No. 003-10368-00034)

Benzene: 0.97 tpy
Napthalene: 0.24 tpy
Ethylbenzene: 0.48 tpy
Toluene: 5.32 tpy
Cyclohexane: 1.21 tpy

Xylene: 2.42 tpy

MTBE: 3.63 tpy
Lead: 0.12 tpy
Combination HAPs 14.39 tpy

Appendix A: Emissions Calculations

Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)

#2 Fuel Oil

Company Name: Limited Corporation

Address, City IN Zip: 4133 New Haven Avenue, Fort Wayne, IN 46803

CP: 003-15062 Plt ID: 003-00034

Reviewer: Madhurima D. Moulik

Date: Dec 4, 2001

Heat Input Capacity MMBtu/hr

Potential Throughput kgals/year

S = Weight % Sulfur 0.25

2.8

175.2

| | Pollutant | | | | |
|-------------------------------|-----------|----------|------|------|-----|
| | PM* | SO2 | NOx | VOC | CO |
| Emission Factor in lb/kgal | 2.0 | 35.5 | 20.0 | 0.34 | 5.0 |
| | | (142.0S) | | | |
| Potential Emission in tons/yr | 0.2 | 3.1 | 1.8 | 0.0 | 0.4 |

Methodology

1 gallon of No. 2 Fuel Oil has a heating value of 140,000 Btu

Potential Throughput (kgals/year) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1kgal per 1000 gallon x 1 gal per 0.140 MM Btu

Emission Factors are from AP 42, Tables 1.3-1, 1.3-2, and 1.3-3 (SCC 1-03-005-01/02/03) Supplement E 9/98 (see erata file)

*PM emission factor is filterable PM only. Condensable PM emission factor is 1.3 lb/kgal.

Emission (tons/yr) = Throughput (kgals/ yr) x Emission Factor (lb/kgal)/2,000 lb/ton

Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emission calculations.

Appendix A: Emissions Calculations

Commercial/Institutional/Residential Combustors (< 100 mmBtu/hr)

#1 and #2 Fuel Oil

HAPs Emissions

Company Name: Limited Corporation

Address, City IN Zip: 4133 New Haven Avenue, Fort Wayne, IN 46803

CP: 003-15062 Plt ID: 003-00034

Reviewer: Madhurima D. Moulik

Date: Dec 4, 2001

HAPs - Metals

| Emission Factor in lb/mmBtu | Arsenic | Beryllium | Cadmium | Chromium | Lead |
|-------------------------------|----------|-----------|----------|----------|----------|
| | 4.0E-06 | 3.0E-06 | 3.0E-06 | 3.0E-06 | 9.0E-06 |
| Potential Emission in tons/yr | 4.91E-05 | 3.68E-05 | 3.68E-05 | 3.68E-05 | 1.10E-04 |

HAPs - Metals (continued)

| Emission Factor in lb/mmBtu | Mercury | Manganese | Nickel | Selenium |
|-------------------------------|----------|-----------|----------|----------|
| | 3.0E-06 | 6.0E-06 | 3.0E-06 | 1.5E-05 |
| Potential Emission in tons/yr | 3.68E-05 | 7.36E-05 | 3.68E-05 | 1.84E-04 |

Methodology

No data was available in AP-42 for organic HAPs.

Potential Emissions (tons/year) = Throughput (mmBtu/hr)*Emission Factor (lb/mmBtu)*8,760 hrs/yr / 2,000 lb/ton

Source Name: Limited Corporation Page 4 of 5 TSD Appendix A

Source Location: 4133 New Haven Avenue, Fort Wayne, IN 46803

County: Allen SIC Code: 5171

Operation Permit No.: 003-15062-00034

Permit Reviewer: Madhurima D. Moulik

Date: Dec 4, 2001

Emissions from Boilers A and B (PTE in tons per year)

| Pollutant | Potential Emissions (lb/day) | Potential Emissions (tons/yr) |
|----------------------------|---------------------------------|----------------------------------|
| PM from fuel oil boiler | 9.86 | 1.80 |
| PM from natural gas boiler | 1.15 | 0.21 |
| PM-10 | 1.15 | 0.21 |
| SO2 | 35.13 | 6.41 |
| VOC | 1.61 | 0.29 |
| СО | 26.67 | 4.87 |
| NOx | 108.77 | 19.85 |
| Single HAP | - | - |
| Combination HAPs | - | - |

Source Name: Limited Corporation Page 5 of 5 TSD Appendix A

Source Location: 4133 New Haven Avenue, Fort Wayne, IN 46803

County: Allen SIC Code: 5171

Operation Permit No.: 003-15062-00034
Permit Reviewer: Madhurima D. Moulik

Date: Dec 4, 2001

Total Emissions (PTE in tons/yr)

| Equipment | PM | PM-10 | SO2 | VOC | СО | NOx | Benzene | Napthalene | Ethylbenzene | Toluene | Cyclohexan e | Xylene | MTBE | Lead | Comb HAPs |
|-------------------------|-----|-------|------|------|------|-------|---------|------------|--------------|---------|-----------------|--------|------|------|--------------|
| Boilers A & B | 2.0 | 0.21 | 6.41 | 0.29 | 4.87 | 19.85 | - | - | - | - | - | - | - | - | - |
| Boiler C | 0.2 | 0.2 | 3.1 | - | 0.4 | 1.8 | - | - | - | - | - | - | - | - | - |
| Tanks & Loading Rack | - | - | - | 24.6 | - | - | 0.97 | 0.24 | 0.48 | 5.32 | 1.21 | 2.42 | 3.63 | 0.12 | 14.39 |
| Total | 2.2 | 0.4 | 9.5 | 24.9 | 5.27 | 21.65 | 0.97 | 0.24 | 0.48 | 5.32 | 1.21 | 2.42 | 3.63 | 0.12 | 14.39 |